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[Proposed] Attorneys for Richard M. Pachulski,
Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

LAYFIELD & BARRETT, APC

Debtor.

Case No.: 2:17-bk-19548-NB

Chapter 11

**NOTICE OF FILING OF CHAPTER 11
TRUSTEE'S APPLICATION TO EMPLOY
PACHULSKI STANG ZIEHL & JONES LLP
AS GENERAL BANKRUPTCY COUNSEL
EFFECTIVE AS OF AUGUST 22, 2017**

[Relates to Docket No. 64]

[NO HEARING REQUIRED UNLESS
REQUESTED PER L.B.R. 2014-1(b)]

**TO THE HONORABLE NEIL W. BASON, UNITED STATES BANKRUPTCY JUDGE,
THE OFFICE OF THE UNITED STATES TRUSTEE, AND OTHER PARTIES IN
INTEREST:**

PLEASE TAKE NOTICE that Richard M. Pachulski, Chapter 11 Trustee (the
“Trustee”) for Layfield & Barrett, APC, debtor herein, has submitted its application to employ
Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”) as his general bankruptcy counsel,
effective as of August 22, 2017 [Docket No. 64] (the “Application”).

PLEASE TAKE FURTHER NOTICE that by the Application, the Trustee seeks Court
approval of the proposed employment of the Firm to, among other things, render the following
services:

- Advise the Trustee concerning the rights and remedies of the estate in regard to the assets of the estate, and with respect to administrative expense and secured, priority and unsecured claims of creditors asserted against the estate;
- Represent the Trustee in connection with financial and business matters, including the sale of any assets;
- Represent the Trustee in connection with investigation of potential causes of action, and the litigation thereof if warranted and directed by the Trustee;
- Investigate and prosecute preferences, fraudulent transfers and other actions, if any, arising under the Trustee's avoiding powers;
- Represent the Trustee in any proceeding or hearing in the Bankruptcy Court, and in any action in other courts where the rights of the estate may be litigated or affected;
- Conduct examinations of witnesses, claimants, or adverse parties and prepare and assist in the preparation of motions, applications, answers, orders, memoranda, reports and papers;
- Advise the Trustee concerning the requirements of the Bankruptcy Code and Rules and the requirements of the Office of the United States Trustee relating to the administration of the estate; and
- Render such other advice and services as the Trustee may require in connection with this Case.

PLEASE TAKE FURTHER NOTICE that the Trustee desires to employ PSZJ and to compensate PSZJ reasonable fees to be determined by the Court. No compensation will be paid to the Firm except as ordered by the Bankruptcy Court pursuant to any interim compensation procedures or upon application to, and approval by, the Bankruptcy Court after notice and a hearing. The Firm has received no retainer in connection with this case. The attorneys currently expected to be principally responsible for the Case, and their respective hourly rates effective as of January 1, 2017, are as follows: Ira D. Kharasch - \$1,025; Debra I. Grassgreen - \$975; and Malhar S. Pagay - \$750. The hourly rate for Beth Dassa and Patricia Jeffries, the paralegals assigned to the Case, is \$350.

PLEASE TAKE FURTHER NOTICE that a copy of the Application may be obtained by contacting Beth Dassa, Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor,

1 Los Angeles, California 90067, (310) 277-6910, Facsimile (310) 201-0760, email:
2 bdassa@pszjlaw.com.

3 **PLEASE TAKE FURTHER NOTICE** that pursuant to Local Bankruptcy Rule 2014-1(b),
4 a hearing is not required in connection with the Application unless requested by the United States
5 Trustee, a party in interest, or otherwise ordered by the Court. Pursuant to Local Bankruptcy Rule
6 2014-1(b)(3), any response to the Application and request for hearing must be in the form prescribed
7 by Local Bankruptcy Rule 9013-1(f)(1) and must be filed with the Court and served upon the Firm,
8 at the address in the upper left-hand corner of the first page of this Notice, and the United States
9 Trustee no later than 14 days from the date of service of this notice.

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11 Dated: August 29, 2017

PACHULSKI STANG ZIEHL & JONES LLP

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13 By /s/ Malhar S. Pagay

Ira D. Kharasch
Debra I. Grassgreen
Malhar S. Pagay

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15 [Proposed] Attorneys for Richard M.
16 Pachulski, Chapter 11 Trustee
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Boulevard, 13th Floor, Los Angeles, California 90067

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF FILING OF CHAPTER 11 TRUSTEE'S APPLICATION TO EMPLOY PACHULSKI STANG ZIEHL & JONES LLP AS GENERAL BANKRUPTCY COUNSEL EFFECTIVE AS OF AUGUST 22, 2017** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **August 29, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **August 29, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **August 29, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY

Honorable Neil W. Bason
U.S. Bankruptcy Court
255 E. Temple Street, Room 940
Los Angeles, CA 90012
Attn: Mail Room Clerk-Judges Copies

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 29, 2017

Date

Myra Kulick

Printed Name

/s/ Myra Kulick

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Mailing Information for Case 2:17-bk-19548-NB

- *Moises S Bardavid* mbardavid@hotmail.com
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- *Michael F Perlis*
- *Daniel H Reiss* dhr@lnbyb.com, dhr@ecf.inforuptcy.com
- *Lindsey L Smith* lls@lnbyb.com, lls@ecf.inforuptcy.com
- *Daniel A Solitro* dsolitro@lockelord.com, ataylor2@lockelord.com
- *United States Trustee (LA)* ustpreion16.la.ecf@usdoj.gov
- *Alan J Watson* alan.watson@hklaw.com, gloria.hoshiko@hklaw.com

2. SERVED BY UNITED STATES MAIL:

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